

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Allan Chiocca,

Plaintiff

v.

Civ. A. No.: 1:19-cv-10482-WGY

**The Town of Rockland, Deirdre Hall,
Edward Kimball, Larry Ryan,
Michael Mullen Jr., Michael O’Loughlin,
Richard Penney, and Kara Nyman**

Defendants

**DECLARATION OF SAMANTHA C. HALEM IN SUPPORT OF
PLAINTIFF/COUNTERCLAIM DEFENDANT ALLAN CHIOCCA’S
SUPPLEMENTAL REPLY MEMORANDUM OF LAW IN SUPPORT OF
SUMMARY JUDGMENT MOTION ON COUNTERCLAIMS AND IN CONNECTION
WITH THE CASE STATED HEARING**

I, Samantha C. Halem, declare as follows:

1. I am a partner at Marshall Halem, LLC (“Marshall Halem”) and counsel for Plaintiff/Counterclaim Defendant Allan Chiocca (“Chiocca”) in this action. I submit this Declaration in support of Chiocca’s Motion for Summary Judgment on Defendant/Counterclaim Plaintiff Deirdre Hall’s Counterclaims and Defendant/Counterclaim Plaintiff Edward Kimball’s Counterclaim. Included within this Declaration are documents related to a recently-taken deposition that contains essential evidence in the case.

2. Attached hereto are true and correct copies of the following documents:

EXHIBIT A – Excerpts and exhibits from the Deposition of Casey Sherman, taken April 8, 2022.

EXHIBIT B – Excerpt from the Deposition of Deirdre Hall, Volume II, taken October 4, 2021.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 18th DAY OF MAY, 2022.

/s/ Samantha C. Halem
Samantha C. Halem